



WILBUR-ELLIS®

December 11, 2015

Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503

**RE: Comments to Aquatic Plant and Algae Management Draft General Permit**

By way of this comment, Wilbur-Ellis Company is requesting that the Washington Department of Ecology add a recently registered product named Denali-EA™ to the *Aquatic Plant and Algae Management General Permit* to the "Listed Adjuvants" as displayed in Table 2 of the draft permit. Denali-EA is an adjuvant product that includes the aquatic use site on the label and this product was registered by the Washington State Department of Agriculture ("WSDA") on November 12, 2015 which came after the Washington Department of Ecology ("DOE") publication and release of the Draft Permit for comment.

In light of the fact that the normal process for registration of a pesticide or adjuvant that contains directions for use on an aquatic use site requires the dual evaluation and approval of DOE and WSDA, the aforementioned WSDA registration of Denali-EA establishes the basis that the product has passed the requisites to add this product to the Listed Adjuvants table.

DENALI-EA™ is the newest product in Wilbur-Ellis Company's ECO ADVANTAGE (EA) line of adjuvants. The ECO ADVANTAGE™ products are designed with an environmental and user friendly profile and provide high performance, meet regulatory requirements for use on aquatic sites, exhibit improved safety and handling to people and are nonylphenol ethoxylate (NPE) free.

Respectfully,

Andrew Chang  
Product Registration Manager  
Wilbur-Ellis Company

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